

Topinka, Natalie

From: Topinka, Natalie
Sent: Wednesday, December 31, 2014 7:30 AM
To: Dylan Foglesong
Cc: Bellairs, Katharina; Tennenbaum, Susan
Subject: RE: One more clarification

Categories: For FOIA response

Dylan,

Sorry I did not see this before I was out for the holiday break. I got a chance to talk with some folks who work closely with E&P Tanks and have an answer for you.

The pressurized liquid sample theoretically (i.e., if sampling is properly conducted) contains the gas that then flashes downstream at the storage tank and results in emissions. This is the basis for the "liquid and gas samples..." language in the information request letter – apologies for not phrasing that more clearly.

E&P TANKS offers three input options for calculating site-specific emissions:

- 1) Low Pressure ("LP") Gas – referring to the basis being a sample of the separator outlet gas;
- 2) Low Pressure ("LP") Oil – referring to the basis being a sample of the separator outlet liquid (upstream of where flashing would occur); and
- 3) High Pressure ("HP") Oil – referring to the basis being a sample of the separator inlet fluid.

LP Oil relies on a pressurized liquid sample from the separator, so the LP Oil model should be used. I believe this is the same option your consultant was leaning toward.

Please let me know if you have any other questions or clarifications. Thank you again for your close attention to this issue. And Happy New Year!

Natalie

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From: Dylan Foglesong [mailto:dylan@savoyexp.com]
Sent: Tuesday, December 23, 2014 3:13 PM
To: Topinka, Natalie
Subject: One more clarification
Importance: High

Natalie,

We are going to work up the tank emission estimate using the API software per the EPA's request. The consultant we are working with says that using the "pressurized liquid option" in this software does not require a gas analysis. He goes on to say there is another option with the same API software that does use a gas analysis. The latest request for information letter references both liquid and gas sampling, please clarify if there is a specific API software 'model' required, or if it is up to our discretion on which 'model' we run.

Thanks,

Dylan Foglesong

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